

FLYNN, DELICH & WISE LLP

ATTORNEYS AT LAW
ONE CALIFORNIA STREET, SUITE 350
SAN FRANCISCO, CALIFORNIA 94111
(415) 693-5566

1 CONTE C. CICALA (173554)
2 FLYNN, DELICH & WISE LLP
3 One California Street, Suite 350
4 San Francisco, CA 94111
5 Telephone: (415) 693-5566
6 Facsimile: (415) 693-0410

7
8 ATTORNEYS FOR PLAINTIFF
9 "K" LINE AMERICA, INC.

10
11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA

14 "K" LINE AMERICA, INC., a
15 corporation,

16 Plaintiff,

17 vs.

18 MARSH RISK AND INSURANCE
19 SERVICES; MARSH USA, INC.; MMC,
20 INC., SEDGWICK JAMES; AND DOES
21 ONE THROUGH TEN,

22 Defendants.

) Case No.: C-06-02268 MJJ

)
) **STIPULATION AND ~~PROPOSED~~ ORDER**
) **REGARDING DISCOVERY DISPUTE**

23
24 **STIPULATION AND PROPOSED ORDER REGARDING**
25 **DISCOVERY DISPUTE**

26 Whereas, MARSH USA INC. ("MARSH") has not yet made its
27 written Initial Disclosures which were initially due June 20,
28 2006, nor has it timely responded to written discovery requests
of "K" LINE AMERICA, INC. ("KAM"), which were due on February 21,
2007; and,

Whereas KAM has timely and properly met and conferred with
MARSH over these issues; and,

STIPULATION AND ORDER RE: DISCOVERY
CASE NO. C-06-02268 MJJ

FLYNN, DELICH & WISE LLP

ATTORNEYS AT LAW
ONE CALIFORNIA STREET, SUITE 350
SAN FRANCISCO, CALIFORNIA 94111
(415) 893-5566

Whereas MARSH and KAM wish to resolve this dispute without the need for formal motion or other contested petition to the Court, and instead wish to enter into a stipulation and order reflecting relief that would in the ordinary course be likely to be granted after a discovery motion;

MARSH and KAM hereby agree and stipulate as follows:

- 1) MARSH shall serve its initial disclosures and its response to KAM's outstanding written discovery requests, without objection save as to privilege, no later than March 9, 2007;
- 2) As to KAM only, KAM's fact discovery, expert disclosure, expert report and expert discovery cutoffs are each hereby extended 35 days.
- 3) All other dates are maintained. MJJ

DATED: March 5, 2007

FLYNN, DELICH & WISE LLP

By 

Conte C. Cicala

Attorneys for Plaintiff
"K" LINE AMERICA, INC.

DATED: March 5, 2007

LUCE, FORWARD, HAMILTON & SCRIPPS

By 

Denis F. Shanagher

Attorneys for Defendant
MARSH USA, INC.

///

FLYNN, DELICH & WISE LLP

ATTORNEYS AT LAW
ONE CALIFORNIA STREET, SUITE 350
SAN FRANCISCO, CALIFORNIA 94111
(415) 693-5566

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

Pursuant to stipulation, and good cause having been
shown,

IT IS SO ORDERED.

Dated: 3/7/07



UNITED STATES DISTRICT JUDGE